



DEPARTMENT OF FISH AND GAME

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1416 Ninth Street
Sacramento, CA 95814



February 13, 2004

Dr. James Reede, Project Manager
California Energy Commission
1516 Ninth Street, MS-39
Sacramento, CA 95814

Subject: Presiding Members Proposed Decision (PMPD) on the El Segundo
Power Redevelopment Project and Application for Certification,
Docket No. 01-AFC-14

Dear Dr. Reede:

Department of Fish and Game (Department) staff have reviewed the Presiding Members Proposed Decision (PMPD), dated January 30, 2004. This letter serves to relay the Department's concerns regarding the certification of the El Segundo Power Redevelopment Project and the PMPD. The PMPD is in response to the application for certification submitted by the El Segundo Power II LLC. The power company proposes to demolish two units at the existing facility and replace them with a 630 MW combined cycle power plant. The new facility would use cooling water from the Pacific Ocean utilizing the existing cooling water intake system. The PMPD recommends that the Energy Commission certify the project with conditions. These conditions include: 1) an annual flow cap; 2) provisions for conductance of a study addressing the feasibility of deploying a gunderboom around the intake to reduce impingement and entrainment impacts; and 3) a monetary donation from the project proponent to the Santa Monica Bay Restoration Commission in the amount of \$1,000,000.

In a letter dated June 26, 2002, and in oral testimony provided at the Energy Commission Committees' February 18 and 19, 2003 public hearing, the Department identified issues regarding the certification of the proposed El Segundo Power Redevelopment Project. Specifically, the Department expressed concerns about the report entitled *El Segundo Power Redevelopment Project*,

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Supporting Impact Analysis of Entrainment and Impingement submitted by the power company. This report attempted to address impingement and entrainment issues at the facility. It is the Departments' understanding that the previous studies used to address entrainment issues addressed by this report were conducted at least 20 years ago and that the studies did not include collecting site specific impingement and entrainment data at the El Segundo Power Plant. In the report, the project proponent indicates that the impingement and entrainment studies done at other facilities adequately reflect the existing impacts that are realized at the El Segundo facility. In this report, the project proponent states that the results of these studies indicate that the El Segundo facility is not having a significant impact on fish and plankton resources within the near shore environment in the vicinity of the facility.

At the February 2003 hearing, the power company staff and consultants presented oral testimony regarding the validity of the earlier impingement and entrainment studies for the proposed power plant redevelopment project. As we stated at that hearing, the Department does not concur that the findings of 20-year old study, conducted at off-site facilities, adequately assess the current or future impact potential at the El Segundo facility. Department staff reiterated our recommendation that a 316(b)-like site specific study be conducted for the El Segundo facility. We explained that such a study would provide a more thorough assessment of the potential impacts associated with the current and proposed plant operation and would supply the necessary data to make scientifically sound management decisions regarding avoidance, reduction, or if necessary, mitigation for the on-going and future impingement and entrainment impacts at the facility.

The Department continues to recommend that a one-year field survey be conducted at the El Segundo Facility. The survey should be conducted in a similar fashion to that of other 316(b) studies that have been undertaken at power plant facilities throughout the state (e.g. Moss Landing, Morro Bay, Diablo Canyon, etc.). The lack of up-to-date site specific data on impingement and entrainment impacts at the El Segundo facility leaves a data gap in the information needed to scientifically assess the power plant's operational impacts. The Department believes that it is premature to prescribe conditions that would address impacts when the extent of those impacts is not known. Further, the conditions and characteristics of Santa Monica Bay have changed considerably in the last 20 years. Water quality issues, declining fish stocks, and increases in fishing pressure have resulted in a very different environmental setting than what existed 20 years ago. For these reasons, the Department again recommends that the power company be required to conduct a 316(b)-like study prior to the certification of the proposed power plant redevelopment project.

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Thank you for the opportunity to comment on the PMPD. Should you or your staff have any questions, please feel free to contact Mr. William Paznokas, Staff Environmental Scientist, at (858) 467-4218.

Sincerely,

A handwritten signature in dark ink, appearing to read "Eric J. Larson", is written over a horizontal line. The signature is fluid and cursive.

ERIC J. LARSON
Ecosystem Coordinator
Marine Region

cc: William Paznokas, Marine Region, San Diego